

1 **DANIEL F. LIPPMANN, ESQ.**

2 Nevada Bar No. 11636

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8 *Attorney for Defendant*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13 JONATHAN RISSE-SANTOS,)

14 Defendant.)

CASE NO: 2:21-mj-00283-EJY

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(Sixth Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
16 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel
17 for the United States of America, and Daniel F. Lippmann, Esq., counsel for Defendant,
18 JONATHAN RISSE-SANTOS, that the preliminary hearing presently scheduled for January 20,
19 2022, be vacated and continued to a time convenient to the Court but no sooner than 30 days.

20 This Stipulation is entered into for the following reasons:

- 21 1. Counsels for the United States and Mr. Risse-Santos have reached an agreement and
- 22 pleadings have been prepared to enter the plea.
- 23 2. Counsel needs additional time to schedule an in-person visit with Mr. Risse-Santos to
- 24 fully revise this agreement prior to entry of plea.
- 25 3. Mr. Risse-Santos is in custody and does not object to the continuance.
- 26 4. Furthermore, denial of this request for continuance could result in a miscarriage of justice.
- 27 5. The parties agree to the continuance.
- 28

1 6. This is the sixth request for a continuance.

2 The additional time requested by this stipulation is excludable in computing the time
3 within which the defendant must be indicted and the trial herein must commence pursuant to the
4 Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18
5 U.S.C. § 3161(h)(7)(B)(i) and (iv).
6

7 DATED this 12th day of January, 2022
8
9

10 s/Supriya Prasad
11 SUPRIYA PRASAD, ESQ.
12 Assistant United States Attorney

13 s/Daniel F. Lippmann
14 DANIEL F. LIPPMANN, ESQ.
15 Nevada Bar No. 11636
16 *Attorney for Defendant*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

JONATHAN RISSE-SANTOS,
Defendant.

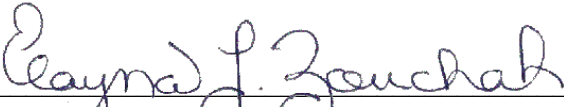
CASE NO: 2:21-mj-00283-EJY

ORDER

Based on the Stipulation of counsel, good cause appearing therefore:

IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on January 20, 2022, be vacated and continued to February 22, 2022 at the hour of 4:00pm.

DATED this 13 day of January, 2022.


Magistrate Judge Elayna J. Youchah